

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

UNITED STATES OF AMERICA )  
 )  
v. ) Case No.: 2:05-cr-214-MHT  
 )  
SANDRA G. DIXON )

## **UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW the Defendant, **SANDRA G. DIXON**, through undersigned counsel, Donnie W. Bethel, and moves this Honorable Court to modify the conditions of her pretrial release. In support of this motion, the Defendant would show the following:

1. Defendant is currently on release pending sentencing. One of the conditions of her release is that she not leave the Middle District of Alabama

2. Defendant's nephew has suffered a gunshot wound and is in critical condition on life support in a hospital in Cook County, IL. Defendant wishes to accompany her family to see her nephew, leaving as soon as is practicable. Therefore, Defendant requests that the conditions of her release be modified to allow her to leave the Middle District of Alabama with the express permission of her probation officer, Kevin Poole.

5. The United States, through Assistant United States Attorney Susan Redmond, does not oppose this motion; Defendant's probation officer, Kevin Poole, also does not oppose this motion.

**WHEREFORE**, the Defendant, respectfully requests that this Honorable Court grant her motion to modify the conditions of her pretrial release.

Dated this 11th day of April, 2006.

Respectfully submitted,

s/ Donnie W. Bethel  
DONNIE W. BETHEL  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Susan R. Redmond, Esq.  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, Alabama 36104

Respectfully submitted,

s/ **Donnie W. Bethel**  
**DONNIE W. BETHEL**  
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